

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

LYNNE FREEMAN,

Plaintiff,

vs.

TRACY DEEBE-ELKENANEY P/K/A

TRACY WOLFF, et al.,

Defendants.

Case No.: 1:22-cv-02435-LLS-SN

**DEFENDANTS' NOTICE OF DEFENDANTS'
DAUBERT MOTION TO EXCLUDE PLAINTIFF'S LIABILITY
EXPERTS AND OPPOSITION TO PLAINTIFF'S DAUBERT MOTION**

PLEASE TAKE NOTICE THAT, Defendants Tracy Deebes-Elkenaney p/k/a Tracy Wolff, Entangled Publishing LLC, Emily Sylvan Kim, Prospect Agency, LLC, Holtzbrinck Publishers, LLC d/b/a Macmillan, and Universal City Studios LLC (collectively, "Defendants"), through their respective undersigned counsel, upon the accompanying (i) Memorandum In Support of *Daubert* Motion to Exclude Plaintiff's Liability Experts and Opposition to Plaintiff's *Daubert* Motion (ii) Declaration of Benjamin S. Halperin dated February 7, 2024 and the exhibits annexed thereto; and (iii) Declaration of Emily Kim dated February 7, 2024, hereby move this Court at the United States District Court for the Southern District of New York, 40 Foley Square, Courtroom 430, New York, New York 10007, before the Honorable Sarah Netburn, on a date and time to be designated by the Court, for an order: (1) excluding in full the opinions of Plaintiff Lynne Freeman's experts Kathryn Reiss, Dr. Patrick Juola, Dr. Carole Chaski, Christine Witthohn, Eric Ruben, Esq., and Marlene Stringer; (2) denying Plaintiff's *Daubert* motion (ECF No. 314) in full; and (3) granting such other order and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court's January 23, 2024 Order (ECF No. 319), Plaintiff's opposition must be served by February 28, 2024.

Dated: New York, New York
February 7, 2024

Respectfully submitted,

**COWAN DEBAETS ABRAHAMS
& SHEPPARD, LLP**

By: /s/ Nancy E. Wolff

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CERTIFICATE OF SERVICE

I, Nancy E. Wolff, hereby certify that a true and correct complete copy of Defendants' Notice of Motion for Defendants' *Daubert* Motion to Exclude Plaintiff's Liability Experts and Opposition to Plaintiff's *Daubert* Motion and all documents and exhibits annexed thereto has been served on all counsel of record via the Court's CM/ECF service.

/s/ Nancy E. Wolff
Nancy E. Wolff